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September 15, 2014

VIA ECF

The Hon. Andrew J. Peck
United States District Court
500 Pearl Street, Room 20D
New York, NY 10007

**Re: *Laura Dwight v John Wiley & Sons Inc., No. 14-cv-6742 (VSB)(AJP)*
Mark Gibson v John Wiley & Sons Inc., No. 14-cv-6743 (VSB)(AJP)
Louis Psihoyos v John Wiley & Sons Inc., No. 14-cv-6744 (VSB)(AJP)
David Wells v John Wiley & Sons Inc., No. 14-cv-6745 (AT)(AJP)
*Norbert Wu v John Wiley & Sons Inc., No. 14-cv-6746 (AKH)(AJP)***

Dear Judge Peck:

This firm was retained at the end of last week to represent defendant John Wiley & Sons, Inc. ("Wiley") in the five matters referenced above. We write to respectfully request an extension of the time for Wiley to answer, move or otherwise respond to the Complaints filed in each of these cases, from September 16, 2014 up to and including October 15, 2014.

We make this request in view of the time needed for us to further analyze the Complaints and gather additional information from the client. Based on our very limited review of the cases so far, it appears that some of them may be subject to motions to dismiss, and thus our request seeks sufficient time to further evaluate and draft such motions. For example, the Complaint in the *Psihoyos* matter may be subject to dismissal because it involves claims that could have been asserted in a previous action that Mr. Psihoyos brought against Wiley. *See Psihoyos v. John Wiley & Sons, Inc.*, 11 Civ. 1416 (JPO), *aff'd*, 748 F.3d 120 (2d Cir. 2014).

This is Wiley's first request for an extension of time in any of these cases. The undersigned attorney contacted plaintiffs' attorneys and sought their consent to the requested extension. Plaintiffs' attorneys responded that, "[w]hile we would normally be inclined to extend such an extension as a matter of courtesy," they declined to do so here because my firm previously "has represented Wiley," and because plaintiffs filed a related case last year, among other reasons. We respectfully request the Court to grant the requested extension.

Respectfully submitted,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 
Robert Penchina

cc: All Counsel of Record

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